

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SINGULARDTV, GMBH,

Case No. 1:21-cv-10130

Plaintiff,

-against-

ZACHARY LEBEAU and KIMBERLY JACKSON,

Defendants.

**DEFENDANTS' NOTOC OF MOTION TO DISMISS
PLAINTIFF'S AMENDED COMPLAINT**

PLEASE TAKE NOTICE that Defendants Zachary LeBeau and Kimberly Jackson by their respective attorneys, Neil L. Postrygacz and Paul F. Condzal, hereby moves this Court to issue an order pursuant to the Amended Complaint pursuant to Fed. R. Civ. P. 12 (b) (1) for lack of subject matter jurisdiction; Fed. R. Civ. P. 12 (b) (3) for improper venue; and, Fed. R. Civ. P. 12 (b) (6) for failure to state a claim upon which relief may be granted. The grounds for this motion are set forth in the Memorandum of Law in Support of Defendants' Motion to Dismiss the Amended Complaint and the accompanying Declaration of Neil L. Postrygacz.

Dated: New York, New York
April 14, 2022

Respectfully submitted,

/s/ Neil L. Postrygacz
Neil L. Postrygacz
Attorney for Zachary LeBeau

and Kimberly Jackson
Office & PO Address
217 34th street
Brooklyn, New York 1123-6923
Tel: (646) 642-7492
neil@neilesq.com

/s/ Paul F. Condzal
Paul F. Condzal
Attorney for Kimberly Jackson
1330 Avenue of the Americas, 23rd Floor
New York, New York 10019
Tel: (212) 688-3637
paul@condzal-law.com